

## EXHIBIT F

**THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

|   |   |                               |
|---|---|-------------------------------|
| CHRISTOPHER FERGUSON,<br>Individually and on Behalf of All Others<br>Similarly Situated,  | § | CIVIL ACTION 6:17-cv-00111-RP |
| Plaintiff,  | § |                               |
| v.  | § |                               |
| TEXAS FARM BUREAU<br>BUSINESS CORPORATION,<br>TEXAS FARM BUREAU CASUALTY<br>INSURANCE COMPANY,<br>TEXAS FARM BUREAU MUTUAL<br>INSURANCE COMPANY,<br>TEXAS FARM BUREAU<br>UNDERWRITERS,<br>FARM BUREAU COUNTY MUTUAL<br>INSURANCE COMPANY OF TEXAS,<br>SOUTHERN FARM BUREAU LIFE<br>INSURANCE COMPANY, and<br>TEXAS FARM BUREAU, | § | COLLECTIVE ACTION             |
| Defendants.   | § |                               |

## **PLAINTIFFS' FIRST-AMENDED WITNESS LIST**

Plaintiffs submit this trial Witness List and may elicit testimony from the following witnesses:

1. Chris Ferguson (will call)
  2. Brandon Peek (will call)
  3. Brandon Wheeler (will call)
  4. Connie Lovelady (will call)
  5. Darrell Beakley (will call)
  6. Daryl Blackwell (will call)

7. David Henry (will call)
8. Lloyd McCord (will call)
9. Mike Cook (will call)
10. Ricky Martin (will call)
11. Mike Stanton (will call)
12. Gary Clements (will call)
13. Sue Stuckwisch (will call)
14. Jill Rorschach (will call)
15. Corporate Representative of Texas Farm Bureau Defendants (may call)
16. Corporate Representative of Southern Farm Bureau (may call)
17. Sloan Brown (may call)
18. Justin Ingram (may call)
19. Chris Whitney (may call)
20. Jon Sharp (may call)
21. Gary Wood (may call)
22. Shane Jensen (may call)

Plaintiffs reserve their right to amend or supplement this witness list and reserve the right to call anyone on Defendants' witness list.

To the extent that any witness identified as a witness with knowledge of relevant facts by any party to this action is qualified by education, training, or experience to give any expert opinion, Plaintiffs reserve the right to elicit expert opinions and testimony from any such witness.

Plaintiffs reserve the right to elicit opinion testimony from experts designated and called

by other parties to this lawsuit. Plaintiffs express their intention to possibly call witnesses associated with adverse parties and any other party's experts. They do not waive the right to challenge the qualifications of experts designated by other parties to this lawsuit.

Plaintiffs reserve the right to call rebuttal witnesses, including undesignated rebuttal expert witnesses, whose testimony cannot reasonably be foreseen until the presentation of the evidence.

Plaintiffs reserve the right to withdraw the designation of any expert who avers positively that any such previously designated expert will not be called as a witness at trial and to redesignate them as a consulting expert.

Plaintiffs reserve the right to elicit any expert-opinion or lay-opinion testimony at the time of trial which would be truthful, which would be of benefit to the jury to determine material issues of fact, and which would not violate any existing Court Order or the Federal Rules of Civil Procedure.

Plaintiffs designate, as adverse parties, potentially adverse parties, or as witnesses associated with adverse parties, all parties to this suit and all experts designated by any party to this suit, even if the designating party is not a party to the suit at the time of trial. In the event a present or future party designates an expert but then is dismissed for any reason from the suit or fails to call any designated expert, Plaintiffs reserve the right to designate or call such party or any such experts previously designated by any party.

Plaintiffs reserve whatever additional rights they might have with regard to witnesses, including experts, under the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the caselaw construing same, and the rulings of the Court.

Dated: August 5, 2024

**WILLIAMS HART BOUNDAS, LLP**

By: /s/ John Eddie Williams Jr.

John Eddie Williams, Jr.  
Texas Bar No. 21600300  
S.D. Tex. Bar No. 5179  
[jwilliams@whlaw.com](mailto:jwilliams@whlaw.com)  
Brian A. Abramson  
Texas Bar No. 24050193  
S.D. Tex. Bar No. 634741  
[babramson@whlaw.com](mailto:babramson@whlaw.com)  
Sean M. McCarthy  
Texas Bar No. 24065706  
S.D. Tex. Bar No. 987779  
[smccarthy@whlaw.com](mailto:smccarthy@whlaw.com)  
8441 Gulf Freeway, Suite 600  
Houston, Texas 77017  
Telephone: 713-230-2200  
Facsimile: 713-643-6226

**WYLY & COOK, PLLC**

By: /s/ Kelly E. Cook

Kelly E. Cook  
[kcook@wylycooklaw.com](mailto:kcook@wylycooklaw.com)  
State Bar No. 24062675  
S.D. Tex. Bar No: 1022069  
Warren A. Berlanga  
[wberlanga@wylycooklaw.com](mailto:wberlanga@wylycooklaw.com)  
State Bar No. 24085199  
S.D. Tex. Bar No: 2611869  
1415 N Loop W, Suite 1000  
Houston, TX 77008  
Telephone: (713) 236-8330

**LAWSON & MOSHENBERG, PLLC**

By: /s/ Avi Moshenberg

Avi Moshenberg  
Texas Bar No.: 24083532  
[avi.moshenberg@lmbusinesslaw.com](mailto:avi.moshenberg@lmbusinesslaw.com)  
Nick Lawson  
Texas Bar No.: 24083367  
[nick.lawson@lmbusinesslaw.com](mailto:nick.lawson@lmbusinesslaw.com)  
Texas Bar No.: 24083965  
801 Travis St. Suite 2101, #838\  
Houston, TX 77002  
Telephone: 713-449-9644

**ATTORNEYS FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

This is to certify that on August 5, 2024, a true and correct copy of the above and foregoing was served upon all counsel of record via electronic filing and email.

/s/ Avi Moshenberg  
Avi Moshenberg